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OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Supplemental Instructions for the Hazard Ranking System

FROM: Steve Caldwell *Steve Caldwell*  
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TO: ADDRESSEES

Some questions have arisen concerning situations not specifically covered in the Hazard Ranking System (HRS) instructions. In order to promote consistent application of the HRS, we are distributing written responses to those questions. Please ensure that these supplemental instructions are distributed to the appropriate State and EPA Regional personnel.

Attachment

ADDRESSEES

Mr. John Hackler, Reg. I  
Mr. John Frisco, Reg. II  
Ms. Linda Boornazian, Reg. III  
Mr. Wayne Mathis, Reg. IV  
Mr. Rich Bartelt, Reg. V  
Mr. William Rhea, Reg. VI  
Ms. Katie Biggs, Reg. VII  
Mr. John Wardell, Reg. VIII  
Mr. Tom Mix, Reg. IX  
Ms. Joan McNamee, Reg. X

RESPONSES TO QUESTIONS RAISED DURING ERS TRAINING SESSIONS

QUESTION #1

How do you calculate waste quantity for a surface impoundment that has been periodically dredged?

ANSWER

Use the average amount of waste present in the lagoon at any given time. If it is known that the lagoon is not lined and that leaching has occurred, consider if possible the amount released through leaching.

QUESTION #2

For the direct contact route, can the population within a one-mile radius include visitors passing through the area (e.g., people visiting a wildlife refuge located adjacent to a hazardous substance facility)?

ANSWER

No. As for the other four routes, visitors to an area do not count. However, children attending school would be counted because of the likelihood of their contacting the site.

QUESTION #3

To what extent is professional judgment acceptable as a basis for estimating permeability and depth to groundwater?

ANSWER

Professional judgment taking into account knowledge of the local geology is acceptable as long as it is well-documented.

QUESTION #4

Can people drinking contaminated surface water be used as evidence of direct contact?

ANSWER

No.

QUESTION #5

Is a fish kill evidence of direct contact?

ANSWER

No, except for walking catfish.

QUESTION #6

For scoring surface water use, can cattle be considered an economically important resource?

ANSWER

Yes, but cattle cannot be used to establish a target population.

QUESTION #7

What is the surface water use in the case of a public water-supply reservoir which is within three miles downstream of a facility, but where the water intake is more than three miles from the location of the hazardous substance?

ANSWER

The use is likely to be recreational, but cannot be considered drinking water. The following sentence from p. 34 of the HRS Users Manual requires clarification: "The use or uses of interest are those associated with water taken from surface waters within a distance of three miles from the location of the hazardous substance." The intent here is that the surface water used must be taken from a point within three miles of the location of the hazardous substance.

QUESTION #8

How do you extend facility boundaries for the direct contact and fire and explosion routes?

ANSWER

For these two routes, you cannot extend the boundaries to an offsite location of hazardous substances from the facility unless there is evidence that the concentrations offsite constitute a significant direct contact or fire and explosion threat.

QUESTION #9

Can industrial wells be used in determining population served by groundwater?

ANSWER

Yes, but only if workers are drinking the water in the factory.

QUESTION #10

Can abandoned wells be used in determining population served by groundwater?

ANSWER

If a well was closed down because of contamination, it may be used. However, it may not be used if it was abandoned for any other reason.

QUESTION #11

How do you score a contaminated aquifer for which the source of contamination cannot be located?

ANSWER

These types of problems can be readily scored except that it will be difficult to obtain data on waste quantity. Estimates may be made based on observations of plume volume and concentrations of pollutants. However, such estimates will frequently be

infeasible. If no reasonable estimate can be made, the waste quantity should be established as "1" (any waste quantity greater than 0). Distances relevant to establishing targets may be based on points of observation (e.g., wells of pollutants in the groundwater).

QUESTION #12

How are standby wells in a municipal water system to be handled for determining population served by groundwater?

ANSWER

Consider them as production wells.

QUESTION #13

Are tidal changes in river flow considered in determining upstream and downstream for surface water use and distance to a sensitive environment?

ANSWER

Yes, but upstream flow must be documented since not all tidally influenced streams experience reversal of flow.

QUESTION #14

Are data on emissions from the stack of a previously operational incinerator acceptable for documenting an air release?

ANSWER

No.

QUESTION #15

How is radiation considered in the HRS?

ANSWER

Section 101(10)(K) of CERCLA exempts releases of "source, special nuclear, or byproduct material as those terms are defined in the Atomic Energy Act of 1954, in compliance with a legally enforceable license, permit, regulation, or order issued pursuant to the Atomic Energy Act of 1954." However, other radioactive materials may be eligible. Guidance on the eligibility of such materials can be obtained from EPA Headquarters through the EPA Regional Offices. If a question arises regarding toxicity, contact your E&E HRS contact.

QUESTION #16

Can you clarify the definition of a "Federal facility"? How, for example, do you score Federally owned sites leased by a contractor?

ANSWER

All Federally owned facilities should be considered Federal facilities regardless of who operates them.

QUESTION #17

Can a State submit a new site for the State's designated priority site?

ANSWER

Changes in a State's submission are possible under certain conditions. Contact Hal Snyder, Office of Emergency and Remedial Response, (202) 382-3999, for guidance on this matter.

QUESTION #18

Which EPA Form 2070 series (inspection) should be submitted?

ANSWER

Use the new form (2070-13) if it is readily available; otherwise the old form (T2070-3) is acceptable.

QUESTION #19

What do we do if lab analyses that might document an "observed release" are late arriving? Can we submit a score on August 13 based on the assumption that lab data will show a release?

ANSWER

If the site conditions are such that you are confident the data will confirm a release, score the site as if the data were available. However, when scores are communicated on August 13, be sure to indicate those sites where lab analyses have not been completed. When you receive the results, please report them to EPA Headquarters promptly. All data must be submitted and confirmed by mid-September.